

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

A.B.S., as surviving daughter of deceased)
ANTHONY L. SMITH, and a minor, by)
and through her next friend CHRISTINA)
WILSON,)

Plaintiff,)

v.)

BOARD OF POLICE COMMISSIONERS,)
Et al.,)

Defendants.)

Case No.: 4:12-cv-00202-JCH

DEFENDANT’S NOTICE OF SETTLEMENT IN PRINCIPLE
AND MOTION TO STAY ALL DEADLINES

The parties respectfully notify the Court that the parties have agreed in principle to settle the above-captioned matter. Counsel for the parties are in the process of preparing and finalizing the Settlement Agreement and Stipulated Dismissal (“Agreement”). The parties intend to file the Agreement as soon as practicable, but respectfully request that the parties are given 30 days to file the said Agreement. Accordingly, Intervener Annie Smith respectfully requests that the Court stay all deadlines as set forth in the February 27, 2019 Order (doc #219).

Intervener Smith is filing this Notice and Motion with Plaintiff’s A.B.S and Defendants approval and permission.

Respectfully Submitted,

The Legal Solution Group, LLC

By: /s/ Jermaine Wooten #59338MO

Wootenjlw1@aol.com

4144 Lindell Suite 225

St. Louis, MO 63108

314-531-1708 Office

/s/Daniel A. Dailey #6312616IL

Kingdom Litigators

A Public Interest Law Firm

166 W. Washington Ste. 275

Chicago, IL 60602

p: (312) 877-1611

f: (312) 277-3370

ddailey@kingdomlitigators.com

IL Bar: 6312616

/s/ Albert S. Watkins

By: ALBERT S. WATKINS, LC #34553MO

MICHAEL D. SCHWADE, #60862MO

The Pierre Laclède Center

7733 Forsyth Blvd., Suite 600

Clayton, Missouri 63105

314-727-9111 (telephone)

314-727-9110 (facsimile)

albertswatkins@kwklaw.net

mschwade@kwklaw.net

Attorneys for Plaintiff

JULIAN BUSH
CITY COUNSELOR

By: /s/ Michael Garvin

Michael Garvin # 39817 MO

Andrew D. Wheaton #65269 MO

Associate City Counselor

Erin K. McGowan #64020MO

Associate City Counselor

City Hall, Room 314

St. Louis, MO 63103

314.622.3361

FAX: 314.622.4956
garvinm@stlouis-mo.gov
Wheatona@stlouis-mo.gov
McGowanE@stlouis-mo.gov

ERIC SCHMITT
MISSOURI ATTORNEY GENERAL

/s/ D. John Sauer _____
D. John Sauer, MO 58721
First Assistant and State Solicitor
Joshua M. Divine, MO 69875
Deputy Solicitor
Supreme Court Building
207 W. High Street
P.O. Box 899
Jefferson City, MO 65102
Tel: (314) 340-7861
Fax: (314) 340-7029
Email: John.Sauer@ago.mo.gov

CERTIFICATE OF SERVICE

Signature above is certification that on this the 15th day of March, 2019 a true and correct copy of the foregoing document was filed electronically using the CM/ECF System which will cause a copy to be served upon all counsel of record.